



RADIOLOGICAL SOCIETY OF CONNECTICUT, INC.  
A CHAPTER OF THE AMERICAN COLLEGE OF RADIOLOGY

Statement of the Radiological Society of Connecticut  
House Bill 5264  
Public Health Committee  
February 24, 2016

The Radiological Society of Connecticut would like to offer comments on House Bill 5264, *An Act Concerning Accessibility of Medical Diagnostic Equipment*.

The U.S. Access Board is currently reviewing a wide range of standards that would apply to the accessibility of medical equipment for patients. We believe this process should be completed before any state legislation is enacted.

Some facilities might have to change their facility lay-out to accommodate new sizes, etc. We would caution that such build-outs will add to the cost of health care. This will not be the only increased costs to providers. The reimbursement for imaging procedures is affected by the cost of the equipment, and, as such, it could also increase imaging fees and costs to payers and patients.

The American College of Radiology is of the opinion that codifying a reference to a standard recommendation is extremely premature.

The manufacturers should have more details about the actual availability of equipment that meets the new standard, if such equipment is even on the market. The new technology may not even be available for purchase, or if it is available, it may not be available from a variety of manufacturers. Any new equipment would have to go through research/development phase and later go through FDA-approval phase. The facilities may not be in a position to use the new equipment immediately based on physical limitations (weight/size) of new machines and this may require that facilities change lay-outs, move floors, or even move locations, etc.

The U.S. Access Board website states that the standards are still under review and not yet formally adopted. As such, it appears to be more of a policy statement and, without defined specifications, cannot be placed into statute.

As drafted, HB 5624 would require compliance by medical facilities with these standards—which, again, have not yet been formally adopted by the federal board—on any Certificate of Need application filed as soon as October 1, 2016. This simply is not a realistic or feasible timetable.

Our members take great care to ensure that imaging equipment accommodates the needs of our disabled community. We will continue this commitment as the regulatory process over the new equipment standards moves forward.